PROACT
CROSSTALK
An Environmental Resource sponsored by HQ Air Force Center for Environmental Excellence

September 1999

Air Force Wins Four 1999 White House Closing the Circle Awards

The White House Closing the Circle Awards recognize federal organizations and individuals who have created innovative opportunities for recycling, waste prevention, and purchasing of recycled content and environmentally preferable products. Vice President Al Gore announced this year's awards on 25 June 1999. The White House Task Force on Recycling received close to 300 excellent nominations from 17 federal organizations in the seven categories (Waste Prevention, Recycling, Affirmative Procurement, Environmental Preferability, Model Facility Demonstration, Sowing the Seeds for Change, and the Executive Order 12856 Individual Challenge). The Department of Defense is the federal organization representing all military departments. The 18 judges included representatives from academia, industry, and government. The Air Force was well represented among this year's 30 award winners as described below:

- In the *Model Facility Demonstration - Hazardous Waste* category, the Individual Award went to SSgt Chad Pinkerton, 341st Transportation Squadron, Malmstrom AFB, MT. SSgt Pinkerton was responsible for upgrading the Allied Trades facility, which resulted in a 70 percent reduction in hazardous waste streams from the installation.

- In the *Model Facility Demonstration - Non-hazardous Waste* category, the Team Award went to the 4th Civil Engineer Squadron, Langley AFB, VA. This team ensured that construction of a new F-15E Squadron Operations facility adhered to the intent of Executive Order 13101, *Greening the Government through Waste Prevention, Recycling, and Federal Acquisition*, 14 September 1998.

- In the *Recycling Non-hazardous Waste - Military* category, the Individual Award went to Ms. Helen V. Walker, 11th Civil Engineer Squadron, Bolling AFB, District of Columbia. Ms. Walker established and spearheaded all aspects of Bolling AFB's recycling programs including solid waste reduction and reporting, composting, affirmative procurement reporting, environmental compliance, and education.

- In the *Environmental Preferability - Military* category, the Individual Award went to Mr. Philip H. Mook, Jr., Environmental Management, McClellan AFB, CA. Mr. Mook's innovative efforts led to outstanding improvements in the Federal Government's Alternative Fueled Vehicle acquisition and utilization process.

HQ AFCEE and PRO-ACT congratulate all winners!

What's Inside . . .

More information about the White House Closing the Circle awards is available from the Office of the Federal Environmental Executive (OFEE), World Wide Web (WWW) site, http://www.ofee.gov/.

1999 Sustaining Readiness Booklets Now Available

The U.S. Air Force Environmental Program has published its 1999 "Sustaining Readiness" booklet, which showcases the organizations and individuals who received 1998 General Thomas D. White Awards in the areas of Environmental Quality, Restoration, Pollution Prevention, Recycling, Natural Resources Management, Cultural Resources Management, and the National Environmental Policy Act (NEPA). Highlighted are many outstanding and award-winning environmental achievements that demonstrate the Air Force's continued commitment to implementing environmental programs that:

1) sustain readiness;
2) benefit the community; and
3) leverage resources.

Full-color photographs and accompanying text describe the achievements of the winning organizations and individuals. Copies of the booklet are available from PRO-ACT.

Soil Surveys - Valuable Tools for Natural Resource Management

Soil surveys are a crucial piece of information in determining the proper management of natural resources on Air Force (AF) property and in providing continuous compliance with federal, state, and local standards. The first soil surveys were conducted by the U.S. Department of Agriculture (USDA), beginning in 1899, to find areas suitable for agricultural expansion. A soil survey includes the study of vegetation and land features acre by acre. It identifies the different soil types by examining soil layers, usually to a depth of 2 meters. It also describes the slope, possible erosion hazards, color, acidity/alkalinity, and the proportions of sand, silt, clay, and organic matter of the soil. The areas encompassing the different soil types are delineated, the soil type is named according to a national classification system, and the area is outlined on an aerial map by a surveyor.

All updated soil surveys are now digitized and stored in publicly available electronic databases. Today, soil survey operations are conducted in partnership with universities, state agencies, local county governments, private consultants, and other federal agencies. Soil surveys are conducted on about 21 million acres per year and are mapped on a scale of 3 to 5 inches to the mile. More information about obtaining soil surveys in hard copy, or accessing the soil survey database, is found on the USDA-Natural Resource Conservation Service (NRCS), Soil Survey Division WWW site located at http://soils.usda.gov/.

In addition, the NRCS has developed the Stream Visual Assessment Protocol (SVAP) guide to assess the basic level of stream health. Copies of this protocol can be downloaded at: ftp://ftp.wcc.nrcs.usda.gov/downloads/wqam/svapfnl.pdf, or via the website: http://www.wcc.nrcs.usda.gov/wqam/wqam-docs.html

Air Force Instruction (AFI) 32-7064, *Integrated Natural Resources Management,* 1 August 1997, requires the use of soil surveys during the preparation of Integrated Natural Resources Management Plans (INRMP). The INRMP is an essential tool for ensuring continued access to land and air space required to accomplish the AF mission by maintaining these resources in a healthy condition. The INRMP is tailored to each individual installation, but always includes the same general information about the physical environment including the history of the land; the current and intended land use; information about the surrounding community; a description of the climate, acreage, topography, geology and soils; and other characteristics such as possible wetlands, watersheds, floodplains or drainage patterns. Soil surveys can provide most, if not all, of this type of information as the INRMP is prepared. Headquarters Air Force Center for Environmental Excellence, Environmental Conservation and Planning Directorate (HQ AFCEE/EC), provides natural resources training, assists in the preparation of INRMPs for individual installations, and manages contracts for natural resources projects. Contact HQ AFCEE/EC at DSN 240-3869, (210) 536-3869, or visit their World Wide Web (WWW) site at http://www.afcee.brooks.af.mil/.

Draft OEBGD Available

The ***Draft*** *Overseas Environmental Baseline Guidance Document (OEBGD)*, prepared by the Department of Defense (DoD) Overseas Environmental Task Force, is now available for review. The OEBGD is directed for use by DoD Instruction 4715.5, *Management of Environmental Compliance at Overseas Installations,* 22 April 1996. The primary purpose of the OEBGD is to provide criteria and management practices to be used by DoD Environmental Executive Agents (EEAs) in determining Final Governing Standards (FGS) in accordance with DoD Instruction (DoDI) 4715.5, "Management of Environmental Compliance at Overseas Installations." The OEBGD also establishes standards for environmental compliance at DoD installations in countries where no FGS has been established. DoD Instruction 4715.5 also directs the continued maintenance and updating of the OEBGD. The final version is expected to be available in late 1999. The draft OEBGD is presented in a large number of downloadable sections on DENIX at http://www.denix.osd.mil/denix/DOD/ Library/Intl/OEBGD/toc.html.

ECAMP BMP Update

The Air Force Environmental Compliance Assessment and Management Program (ECAMP) is a tool designed to assist Air Force installations and organizations as they assess their compliance with various federal, state, local, and Air Force environmental requirements. Aside from noting potential program non-compliances, ECAMP reports also identify positive findings or Best Management Practices (BMPs), which demonstrate a standard of excellence or an achievement considered best-in-class. The May 1998 ECAMP Final Report for Randolph AFB contained several positive findings, or BMPs, one of which is highlighted here from the Water Quality Management protocol.

Excellent Backflow Prevention Recordkeeping Effort

Potable water systems exist at every Air Force facility and are the responsibility of the Base Civil Engineering Team. Potable water supplies can become contaminated if the system is susceptible to backpressure or back-siphonage from fixtures, equipment, appliances, or buildings. In order to eliminate the potential for this kind of potable water contamination, which may pose a public health threat, backflow prevention devices must be installed at crucial junctures in the system. AFI 32-1066, *Plumbing Systems*, 4 May 1994, requires a series of routine surveys, inspections, and testing procedures designed to maintain the integrity of all backflow and backpressure prevention devices. An installation water supply system can have as many as several hundred backflow prevention devices in place that must be tracked, resulting in a substantial recordkeeping effort.

At Randolph AFB, the 12th Civil Engineering Squadron (12 CES) is responsible for maintenance, repair and construction for all Randolph facilities, grounds, and roadways that support base personnel and a flying mission of more than 275 aircraft. The squadron provides utilities, fire protection, energy conservation, and environmental protection to all base activities. During the 1998 ECAMP at Randolph AFB, the staff of 12 CES/CEOZC were recognized for their outstanding achievements in gathering and tracking crucial information for over 100 on-base backflow prevention devices. At Randolph, back-siphonage of contaminated water into potable water systems is a concern associated with a variety of equipment items, including chillers, boilers, cooling towers, lawn sprinklers, fire suppression systems, and air conditioning systems.

Over several years, SSgt John Patrick, Backflow Program Manager, and SSgt Troy Lovell, spearheaded the effort to bring all backflow prevention records up to date. This included re-inspecting every device (required every 5 years), photographing it, tagging it, and identifying its location on a building diagram. The degree of risk associated with the potential failure of each device was also determined. Higher risk locations were placed on a 6-month inspection and testing schedule, with lower risk locations being placed on 12- and 24-month intervals. A well-organized binder for each building was prepared and includes all the updated forms, diagrams, maintenance schedules, photographs, etc., for each backflow prevention device in the particular facility. All repairs, replacements, new installations, and maintenance tasks are also documented in the appropriate binder. The easy availability and comprehensive nature of this information enables new CES personnel and contractors to quickly and accurately determine the status of any backflow prevention device.

The ultimate goal and result of this aggressive maintenance and recordkeeping effort is the safety of Randolph AFB's potable water supply. Device failures have been minimized, and maintenance, inspection, and repair efforts are targeted to only those devices that truly need it. For more information on Randolph AFB's backflow prevention program, contact SSgt John Patrick, 12 CES/CEOZC, Randolph AFB, TX, (210) 652-1857.

--Success Story--

Minimization of RMP Liability

Section 112(r) of the Clean Air Act (CAA) requires facilities using certain chemical processes to develop and submit a Risk Management Plan (RMP) to the Environmental Protection Agency (EPA). Covered chemical processes are those that handle, manufacture, use, or store above its corresponding threshold quantity, any of the toxic and flammable substances listed in Title 40 Code of Federal Regulations (CFR) 68.130. Several Air Education and Training Command (AETC) installations have eliminated the need to prepare costly RMPs for their chlorine processes by limiting storage quantities at any one location to less than the chlorine threshold quantity of 2,500 pounds. This has been accomplished through modification of chlorine delivery schedules and storage procedures. Delivery schedules have been modified to "just in time" delivery. Chlorine is to be supplied on an "as needed" basis, thereby eliminating the need to store it in quantities that exceed 2,500 pounds. In addition, some AETC bases have divided a single chlorine storage location into smaller individual storage locations.

The benefits are many: Storage of chlorine in amounts not exceeding the threshold quantity minimizes the exposure risk to base personnel and the local population. The severity of releases that may occur will be lessened, limiting both on-site and off-site impacts. Also, eliminating the need for a RMP saved approximately $16,000 in preparation costs, and long term costs associated with routine inspections, personnel training, and public relations activities are avoided.

For more information about this example of the successful minimization of environmental risk and liability, contact Ms. Sharon Moore, HQ AETC, Randolph AFB, TX, (210) 652-3240.

Commercial Vehicular Battery Program

The Defense Supply Center Richmond (DSCR) has a new program for customers to buy and recycle their commercial vehicular batteries. Under the commercial vehicular battery program (CVBP), customers can request delivery of new ready-to-use wet or charged batteries, and have their used batteries picked up. The new delivery system is called Direct Vendor Delivery (DVD). The DSCR WWW site (www.dscr.dla.mil) contains information on the characteristics and technical data for each available battery, and allows for on-line ordering of the products. This effort by DSCR eliminates the need for customers to search for the proper disposal method, allows for door-to-door delivery, and helps customers comply with Executive Order (EO) 13101, *Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition*, September 14, 1998. More information about DSCR and the new Direct Vendor Delivery program, contact Mr. Bill Collins, DSCR, (804) 279-5484, or visit DSCR's "Catalogs with Online Ordering" WWW site at http://www.dscr.dla.mil/catalogs/catalog.htm and select "Batteries, Commercial."

Mercury-containing Lamp Rule Eases Recycling

On 28 June 1999, EPA announced changes to the hazardous waste rules that apply to mercury-containing lamps, including fluorescent bulbs and high-intensity discharge (HID) lamps. The new rule will protect public health and the environment by making recycling of mercury-containing lamps easier and less costly. Lamps that are not recycled will continue to be treated with the same disposal safeguards that apply to all hazardous wastes. Under the new rule, mercury-containing lamps will be treated as a "universal waste." Universal wastes are usually items commonly thrown into the trash by households and small businesses, such as batteries and thermostats. EPA issued the first universal waste rule in 1995 to streamline environmental regulations for wastes produced in relatively small quantities by large numbers of businesses. The new mercury-containing lamp rule was published in 64 Federal Register (FR) 36465 on 6 July 1999. Copies of the rule can be obtained from the EPA's Hazardous Waste WWW page at: http://www.epa.gov/epaoswer/osw/hazwaste.htm#id under "Mercury Waste," or from PRO-ACT.

Technical Inquiry (TI) Roundup

TI 20167 - Flight Helmet Glue

PRO-ACT responded to a customer request for an Environmental Protection Agency (EPA) 17 priority pollutant-free glue used on the SPH4AF flight helmet. The customer stated that the glue now being used, National Stock Number (NSN) 8040-00-515-2246, contains toluene. The glue is used in accordance with Technical Order (T.O.) 14P3-1-181, and must be qualified to Military Specification MIL-A-5540.

PRO-ACT searched the Hazardous Material Information System (HMIS) database for NSN 8040-00-515-2246, and discovered that of the five authorized suppliers listed in the Qualified Products List (QPL) for MIL-A-5540, four are presently supplying two-part glues to this stock number. All four products contain toluene.

We then contacted the Equipment Engineer, 311 HSW/YACL, DSN 240-5127, who stated that only the glues appearing in T.O. 14P3-1-181 can be used on the SPH4AF helmet. The representative also indicated that these glues have been tested in accordance with procedures specified in MIL-A-5540 and have proven to be effective. Other glues have been tested, but did not pass the testing requirements of MIL-A-5540.

TI 20195 - Anti-Splatter Compound

A customer contacted PRO-ACT with a request for an Environmental Protection Agency (EPA) 17 Priority Pollutant-free substitute for a welding anti-splatter product manufactured by Thermacote Welco. The customer stated that this product is used in the Trainer Fabrication shop in various welding processes, and is procured locally using the IMPAC card. There are no technical orders or military specifications associated with the use of this product, and it contains over 80 percent methylene chloride. The customer requested information on a product that is less hazardous or non-hazardous.

PRO-ACT searched the Hazardous Materials Information System (HMIS) for alternatives to the current anti-splatter material and found the following two products do not contain any EPA 17 chemicals:

1. National Stock Number (NSN) 8030-01-106-8393, Anti-Spatter Welding Aid, Dynaflux, Inc., (404) 382-8843; and
2. NSN 3431-00-893-3141, Anti-Splatter Compound, L-Tech Welding and Cutting Systems, (803) 664-4237.

We then searched the 1998 Thomas Register of American Manufacturers. This search revealed the following two companies who offer welding anti-splatter material:

1. Harris-Welco, P.O. Box 69, 1051 York Rd., Kings Mountain, NC 28086, (800) 424-9300. PRO-ACT contacted a product information representative who stated they have a water-based, biodegradable, anti-splatter welding product available in gallon or quart containers. The product does not contain any solvents and is environmentally friendly.
2. Clearco Products, Inc., (800) 468-0452. We spoke with a customer service representative who stated their two anti-spatter products do not contain solvents or other hazardous materials and are environmentally friendly.

In summary, PRO-ACT identified five anti-spatter/splatter welding compounds that are EPA 17 priority pollutant-free. We recommend that customers coordinate the use of these products with their Bioenvironmental Engineering Flight prior to use in order to address any potential occupational health or safety concerns they may have.

TI 20077 - Facility Reinspections for Asbestos

PRO-ACT responded to a customer request for information concerning facility inspection requirements for asbestos. Specifically, the customer wanted to know if there is a requirement to perform reinspections for asbestos every three years.

PRO-ACT first reviewed Title 40 Code of Federal Regulations (CFR) 763.80, "Scope and Purpose." Requirements displayed in this regulation apply only to schools. This rule states, in part, "… that local education agencies are required to identify friable and nonfriable asbestos-containing materials (ACM) in public and private elementary and secondary schools by visually inspecting school buildings for such materials…"

We next reviewed Title 40 CFR 763.85, "Inspection and Reinspections." Title 40 CFR 763.85(b)(1) states that "at least once every three years after a management plan is in effect, each local education agency shall conduct a reinspection of all friable and nonfriable known or assumed ACM in each school building they lease, own, or otherwise use as a school

building." Again, these requirements apply only to school buildings and not to other public or commercial buildings.

PRO-ACT then reviewed Title 40 CFR 61, Subpart M, "National Emission Standard for Asbestos," and determined that this citation does not address periodic facility inspection requirements.

We next reviewed Air Force Instruction (AFI) 32-1052, "Facility Asbestos Management," 22 March 1994. Although the AFI discusses the need to maintain current records of the status and condition of ACM, it does not specifically address inspection requirements.

Finally, we contacted Mr. Gary Jacks, Asbestos Programs Manager, Headquarters Air Force Civil Engineer Support Agency (AFCESA/CESM), DSN 523-6190. Mr. Jacks stated that the USAF has never established a formal requirement to conduct base-wide inspections of facilities for asbestos. He further stated that there is an implied requirement for inspections, since installations are required to develop a plan to manage asbestos, which could include inspections and reinspections. Therefore, he stated, a Major Command (MAJCOM) or installation could establish a requirement for reinspections as part of their management plan. Finally, Mr. Jacks stated that he is not aware of any MAJCOM having established a three-year reinspection requirement.

TI 20248 - Clean-Up Training Requirements

A customer requested information from PRO-ACT on training requirements. The customer stated that they believe Air Force Instruction (AFI) 32-4002, "Hazardous Material Emergency Planning and Response Program," 1 December 1997, specifies that post emergency clean-up personnel, such as heavy equipment operators, must have training prior to working on a contaminated site. Specifically, the customer wanted to know if post emergency clean-up personnel need 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training.

PRO-ACT first reviewed AFI 32-4002, which contains training requirements for Hazardous Material (HAZMAT) emergency response, and directs compliance with Title 29 CFR 1910.120, "Hazardous Waste Operations and Emergency Response."

We next reviewed Title 29 CFR 1910.120, Paragraph (a), "Scope, Application, and Definitions," which states that the requirements of Title 29 CFR 1910.120 cover the following operations, unless the employer demonstrates the operation does not involve employee exposure or the reasonable possibility for employee exposure to safety or health hazards:

1. Clean-up operations required by a government body;

2. Corrective actions involving clean-up operation at sites covered by the Resource Conservation and Recovery Act (RCRA);

3. Voluntary clean-up operations at sites recognized by Federal, State, local or other governmental bodies as uncontrolled hazardous waste sites; or

4. Operations involving hazardous wastes that are conducted at treatment, storage, and disposal facilities.

PRO-ACT then reviewed Title 29 CFR 1910.120 (q)(11), "Post Emergency Response Operations," which states that "upon completion of the emergency response, if it is determined that it is necessary to remove hazardous substances, health hazards and materials contaminated with them (such as contaminated soil or other elements of the natural environment) from the site of the incident, the employer conducting the clean-up shall comply with one of the following:"

1. First, the employer can choose to comply with the requirements of paragraphs (b) through (o) of Title 29 CFR 1910.120 concerning hazardous waste operations and emergency response procedures, which includes HAZWOPER training; or

2. Secondly, since the clean-up is being done on a plant (installation) using plant (installation) employees, the employer also has the option to meet the requirements of the following:

   a. Title 29 CFR 1910.38, "Employee emergency plans and fire prevention plans," subparagraph (a), "Emergency action plan";

   b. Title 29 CFR 1910.134, "Respiratory Protection";

   c. Title 29 CFR 1910.1200, "Hazard communication"; and

   d. Any other appropriate safety and health training specific to the tasks being performed, such as personal protective equipment and decontamination procedures. Further, all equipment to be used in the performance of the clean-up work shall be in serviceable condition, and shall have been inspected prior to use.

We also reviewed AFI 32-4002, Chapter 4.3, which addresses the post-emergency response team and

states that this team must ensure that site clean-up and remediation activities are performed safely, and are consistent with all applicable environmental requirements. Further, it states that training and post emergency response procedures should be carried out in accordance with AFI 32-7042, "Solid Waste and Hazardous Waste Compliance," and Title 29 CFR 1910.120e.

PRO-ACT reviewed Title 29 CFR 1910.120e, which states, in part, that "all employees working on site, (such as, but not limited to equipment operators, general laborers and others) exposed to hazardous substances, health hazards, or safety hazards and their supervisors and management responsible for the site shall receive training meeting the requirements of this paragraph before they are permitted to engage in hazardous waste operations that could expose them to hazardous substances, safety, or health hazards." The training requirements are listed in Title 29 CFR 1910.120(e) through (f). Title 29 CFR 1910.120(e)(3)(i) states that initial training for "general site workers (such as equipment operators, general laborers and supervisory personnel) engaged in hazardous substance removal or other activities which expose or potentially expose workers to hazardous substances and health hazards shall receive a minimum of 40 hours of instruction off the site, and a minimum of three days actual field experience under the direct supervision of a trained experienced supervisor."

We then contacted Mr. Rupert Chavez, Occupational Safety and Health Administration (OSHA), Austin, Texas, (512) 916-5783, extension 226, who stated that post emergency site workers, even if they are only operating heavy duty equipment such as a truck or forklift, are covered by Title 29 CFR 1910.120, and must be trained accordingly.

Finally, PRO-ACT contacted Ms. Donna Karr, OSHA, Jacksonville, Florida, (904) 232-2895, who stated that heavy equipment operators are required to complete initial HAZWOPER training and refresher training requirements. She added that an Air Force Base might be considered a "plant," as referenced in Title 29 CFR 1910.120 (q)(11), "Post Emergency Response Operations."

In summary, Air Force guidance states that training requirements for post emergency response activities are contained in Title 29 CFR 1910.120. Title 29 CFR 1910.120(a)(1) covers operations related to clean-up activities associated with spills of hazardous materials and uncontrolled hazardous waste sites. It states that, if employers can demonstrate these operations do not involve employee exposure, or the possibility of employee exposure, then they are exempted from the requirements of HAZWOPER. Paragraph (e)(i) requires general site workers (such as equipment operators, general laborers and supervisory personnel) to receive a minimum of 40 hours of instruction off the site, and a minimum of three days actual field experience under the direct supervision of a trained experienced supervisor.

TI 20157 - Small Arms Ranges

PRO-ACT responded to a customer request for information concerning an installation Rod and Gun Club. Specifically, the customer needed to know if the Rod and Gun Club members are authorized to use the installation's small arms training range while the Rod and Gun Club range is being cleaned. The customer also wanted to know if Green Bullets, made from tungsten and tin, are regulated by the United States Environmental Protection Agency (EPA).

PRO-ACT reviewed Air Force Instruction (AFI) 32-9003 "Granting Temporary Use of Air Force Real Property." Sections 1.5 and 1.5.7 authorize the use of real property for nonappropriated activities with the approval of the installation commander and the major command. The following requirements must be considered when requesting the temporary use of Air Force real property.

1. This use does not interfere with the mission;
2. Use does not cost the Air Force money; and
3. This use is compatible with Air Force needs, security, and safety.

We also researched the Resource Conservation and Recovery Act (RCRA) regulations for hazardous waste information concerning tin and tungsten. These metals are not regulated by the EPA and they do not meet any of the hazardous waste characteristics listed in Title 40 Code of Federal Regulations, Part 261, Subpart C, "Characteristics of Hazardous Waste."

Finally, we contacted Mr. Dennis Kirsch, Civil Engineering Environmental Quality, Headquarters Air Education and Training Command (HQ AETC/CEVQ), DSN 487-3240, a member of the Joint Federal Non-Toxic Ammunition Working Group. Mr. Kirsch stated that the Air Force should be approving a non-toxic bullet for training in the very near future. Mr. Kirsch also stated that when approved, these bullets will have the same national stock numbers as current training ammunition.

In Our Customer's Own Words . . .

"I love PRO-ACT's 'no stone left unturned' attitude. PRO-ACT personnel are always very thorough and provide great service."

Mr. Mark Blake
Cavalier Air Station, ND

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